



FEMA

R8 - MIT

December 16, 2008

Daniel McGowan, Administrator
Montana Disaster and Emergency Services
1900 Williams Street, P.O. Box 4789
Fort Harrison, MT 59636-4789

Reference: **PLAN APPROVAL – PETROLEUM COUNTY, MONTANA
MULTI-HAZARD MITIGATION PLAN**

Dear Mr. McGowan:

We are pleased to announce the approval of the Petroleum County and Town of Winnett Multi-Hazard Mitigation Plan. All participating jurisdictions which have adopted the plan are now eligible to apply for the Hazard Mitigation Grant Program and Pre-Disaster Mitigation project funds. This plan will be filed in the NEMIS database until the mandatory update is required in five years.

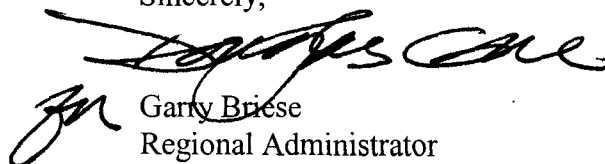
This approval includes the participating jurisdiction(s) – Petroleum County and Town of Winnett. The Flood Mitigation Assistance (FMA) program requirements have been met and would be eligible for the provisions of FMA.

All requests for funding will be evaluated individually according to the specific eligibility and other requirements of the particular program under which the application is submitted. For example, a specific mitigation activity or project identified in the plan may not meet the eligibility requirements for FEMA funding, and even eligible mitigation activities are not automatically approved for FEMA funding under any of the aforementioned programs.

We have provided several comments and recommended revisions for the next update on the attached Plan Review Crosswalk. Please share this crosswalk with the participating communities.

We wish to thank all those that participated in the process. We trust this planning process has raised the City's risk awareness and identified future mitigation projects that can be quickly implemented as funding becomes available. Congratulations to you and your staff for assisting this local community, and making pre-disaster mitigation planning work in your state.

Sincerely,



Garry Briese
Regional Administrator

Enclosure - Crosswalk

LOCAL MITIGATION PLAN REVIEW CROSSWALK

INSTRUCTIONS FOR USING THE PLAN REVIEW CROSSWALK FOR REVIEW OF LOCAL MITIGATION PLANS

Attached is a Plan Review Crosswalk based on the **Local Multi-Hazard Mitigation Planning Guidance**, published by FEMA in July, 2008. This Plan Review Crosswalk is consistent with the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (Stafford Act), as amended by Section 322 of the *Disaster Mitigation Act of 2000* (P.L. 106-390), the *National Flood Insurance Act of 1968*, as amended by the *National Flood Insurance Reform Act of 2004* (P.L. 108-264) and 44 *Code of Federal Regulations (CFR) Part 201 – Mitigation Planning*, inclusive of all amendments through October 31, 2007.

SCORING SYSTEM

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, however, all elements apply. States that have additional requirements can add them in the appropriate sections of the *Local Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements. Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.:

Assessing Vulnerability: Overview				
Requirement §201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.				
Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		
B. Does the new or updated plan address the impact of each hazard on the jurisdiction?	Section II, pp. 10-20	The plan does not address the impact of two of the five hazards addressed in the plan. Required Revisions: <ul style="list-style-type: none">• Include a description of the impact of floods and earthquakes on the assets. Recommended Revisions: This information can be presented in terms of dollar value or percentages of damage.		
SUMMARY SCORE				

LOCAL MITIGATION PLAN REVIEW CROSSWALK

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted. Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

Prerequisite(s) (Check Applicable Box)

1. Adoption by the Local Governing Body: §201.6(c)(5) OR

NOT MET	MET
	NA

2. Multi-Jurisdictional Plan Adoption: §201.6(c)(5)
AND

	X
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3. Multi-Jurisdictional Planning Participation: §201.6(a)(3)

	X
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Planning Process

4. Documentation of the Planning Process: §201.6(b) and §201.6(c)(1)

N	S
	x

Risk Assessment

5. Identifying Hazards: §201.6(c)(2)(i)

N	S
	X

6. Profiling Hazards: §201.6(c)(2)(i)

	X
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7. Assessing Vulnerability: Overview: §201.6(c)(2)(ii)

	X
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8. Assessing Vulnerability: Addressing Repetitive Loss Properties: §201.6(c)(2)(ii)

	X
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9. Assessing Vulnerability: Identifying Structures, Infrastructure, and Critical Facilities: §201.6(c)(2)(ii)(B)

	X
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10. Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B)

	X
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11. Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C)

	X
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12. Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii)

	X
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*States that have additional requirements can add them in the appropriate sections of the *Local Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Mitigation Strategy

13. Local Hazard Mitigation Goals: §201.6(c)(3)(i)

N	S
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14. Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii)

	X
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15. Identification and Analysis of Mitigation Actions: NFIP Compliance. §201.6(c)(3)(ii)

	X
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16. Implementation of Mitigation Actions: §201.6(c)(3)(iii)

	X
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17. Multi-Jurisdictional Mitigation Actions: §201.6(c)(3)(iv)

	X
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Plan Maintenance Process

18. Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(ii)

N	S
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19. Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii)

	X
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20. Continued Public Involvement: §201.6(c)(4)(iii)

	X
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Additional State Requirements*

Insert State Requirement

N	S
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Insert State Requirement

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Insert State Requirement

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LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

☐

See Reviewer's Comments

PLAN APPROVED

☒

LOCAL MITIGATION PLAN REVIEW CROSSWALK

Local Mitigation Plan Review and Approval Status

Jurisdiction: Petroleum County: Town of Winnett, MT	Title of Plan: Pre-Disaster Mitigation Plan	Date of Plan: July 2008
Local Point of Contact: Lisa Solf	Address: PO Box 226 201 East Main Street Winnett, MT 59087	
Title: County Manager, Deputy Disaster and Emergency Services		
Agency: Petroleum County		
Phone Number: 406-429-5551	E-Mail: lsolf@mt.gov	

State Reviewer: Kent Atwood	Title: State Hazard Mitigation Officer	Date: September 5, 2008
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FEMA Reviewer: Reid Dominie Ryan Pietramali	Title: Hazard Mitigation Specialist Risk Analysis Branch Chief	Date: November 6, 2008 December 16, 2008
Date Received in FEMA Region [Insert #]	9/8/2008	
Plan Not Approved		
Plan Approved	12/15/08	
Date Approved	12/16/08	

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. Petroleum County			X	
2. Town of Winnett			X	
3.				
4.				
5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS]				

LOCAL MITIGATION PLAN REVIEW CROSSWALK

* Notes:

Y = Participating

N = Not Participating

N/A = Not Mapped

LOCAL MITIGATION PLAN REVIEW CROSSWALK

PREREQUISITE(S)

1. Adoption by the Local Governing Body

Requirement §201.6(c)(5): [The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Has the local governing body adopted new or updated plan?				n/a
B. Is supporting documentation, such as a resolution, included?				n/a
SUMMARY SCORE				n/a

2. Multi-Jurisdictional Plan Adoption

Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the new or updated plan indicate the specific jurisdictions represented in the plan?	Pg 3-1	"Petroleum County and the Town of Winnett are the focus of the plan developed by the Petroleum County Local Emergency Planning Committee" (3-1).		X
B. For each jurisdiction, has the local governing body adopted the new or updated plan?		Yes Petroleum County approved the plan in a resolution dated 12/1/08 and the Town of Winnett approved the plan on 12/8/08.		X
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	Pg 1-1	Adoption documentation will be provided on page 1-1.		X
SUMMARY SCORE				X

3. Multi-Jurisdictional Planning Participation

Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the new or updated plan describe how each jurisdiction participated in the plan's development?	Pg 3-1	The Plan indicates that it was prepared in joint collaboration between Petroleum County and the Town of Winnett, MT.		X
B. Does the updated plan identify all participating jurisdictions, including new, continuing, and the jurisdictions that no longer participate in the plan?	Pg 3-1 and 3-3	"Each jurisdiction, Petroleum County and the Town of Winnett, participated in the plan's update by sending representatives to meetings, providing data and information, reviewing the plan, and/or adopting the updated plan" (3-3).		X

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SUMMARY SCORE

X

PLANNING PROCESS: §201.6(b): *An open public involvement process is essential to the development of an effective plan.*

4. Documentation of the Planning Process

Requirement §201.6(b): *In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include:*

- (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
- (2) *An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and*
- (3) *Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.*

Requirement §201.6(c)(1): *[The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan provide a narrative description of the process followed to prepare the new or updated plan?	Pg 3-1 to 3-4	The Plan provides a detailed description of the planning process followed during its development, starting back in 2003 to the current update in 2008.		X
B. Does the new or updated plan indicate who was involved in the current planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pg 3-1 and 3-2	The planning process was spearheaded by the LEPC, as assigned by the Petroleum County Commission in 2003. The 2008 update process was facilitated by Big Sky Hazard Management LLC.		X
C. Does the new or updated plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	Pg 3-1 to 3-4	The public was provided ample opportunity to participate in the planning process. The relatively small population of the County allowed for all households to be notified via the local newspaper, The Rampage. Flyers and posters were placed around town. Workshops in March and May 2008 were advertised and open to the public.		X
D. Does the new or updated plan discuss the opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Pg 3-1 to 3-4	Page 3-1 provides a narrative list of the groups involved in the planning process (Neighboring Fergus County Planning Department, among them). The Plan also indicates that information regarding the initial formation of the PDM was given to the business owners in Town. Invitations to participate in the 2008 were sent to neighboring communities.		X
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Pg 3-2 to 3-3, 4-4	A list of plans used in the development process of the Plan is provided on page 3-3; additional resources used are given on page 4-4.		X
F. Does the updated plan document how the planning	Pg 3-3	The Plan provides a list of the major changes that were part of		X

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4. Documentation of the Planning Process

Requirement §201.6(b): In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:

- (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;
- (2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and
- (3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.

Requirement §201.6(c)(1): [The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.

			SCORE	
			N	S
team reviewed and analyzed each section of the plan and whether each section was revised as part of the update process?		the Plan's update.		
SUMMARY SCORE				X

RISK ASSESSMENT: §201.6(c)(2): The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.

5. Identifying Hazards

Requirement §201.6(c)(2)(i): [The risk assessment **shall** include a] description of the type ... of all natural hazards that can affect the jurisdiction.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a description of the types of all natural hazards that affect the jurisdiction?	Pg 4-4 and 4-24 to 4-116	11 Hazards are identified on page 4-4. They are each described in detail in the Hazard Profiles section, 4-24 to 4-116.		X
SUMMARY SCORE				X

6. Profiling Hazards

Requirement §201.6(c)(2)(i): [The risk assessment **shall** include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan **shall** include information on previous occurrences of hazard events and on the probability of future hazard events.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the new or updated plan?	Section 4.4 Hazard Profiles	Locations are identified for each hazard.		X
B. Does the risk assessment identify the extent (i.e.,	Section 4.4	Extent is identified for each hazard.		X

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magnitude or severity) of each hazard addressed in the new or updated plan?	Hazard Profiles			
C. Does the plan provide information on previous occurrences of each hazard addressed in the new or updated plan?	Section 4.4 Hazard Profiles	Previous (historical) occurrences are provided for each hazard.		X
D. Does the plan include the probability of future events (<i>i.e.</i> , chance of occurrence) for each hazard addressed in the new or updated plan?	Section 4.4 Hazard Profiles	The probability of future events is included for each hazard.		X
SUMMARY SCORE				X

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7. Assessing Vulnerability: Overview

Requirement §201.6(c)(2)(ii): [The risk assessment **shall** include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Section 4.4			X
B. Does the new or updated plan address the impact of each hazard on the jurisdiction?	Section 4.4 Subsection: Vulnerabilities	The jurisdictions' vulnerabilities to all the identified hazards are included in the Plan: Critical and Special Needs Facilities; Structures; Infrastructure; Population; Economic, Ecological, Historic, and Social Values.		X
SUMMARY SCORE				X

8. Assessing Vulnerability: Addressing Repetitive Loss Properties

Requirement §201.6(c)(2)(ii): [The risk assessment] **must** also address National Flood Insurance Program (NFIP) insured structures that have been repetitively damaged floods.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of repetitive loss properties located in the identified hazard areas?	Pg 4-54	Note: This requirement becomes effective for all local plans approved after October 1, 2008. "Petroleum County and the Town of Winnett do not have any repetitive loss properties under the National Flood Insurance Program" (4-54).		X
SUMMARY SCORE				X

9. Assessing Vulnerability: Identifying Structures

Requirement §201.6(c)(2)(ii)(A): The plan **should** describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas?	Section 4.4 Subsection: Vulnerabilities	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. The vulnerability in terms of types and numbers of existing buildings is provided within the Plan.		X
B. Does the new or updated plan describe vulnerability in terms of the types and numbers of future buildings,	Section 4.4 Subsection:	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.		X

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infrastructure, and critical facilities located in the identified hazard areas?	Future Development	As best as can be projected from the given data, the Plan provides vulnerability in terms of types and numbers of future buildings.		
X			SUMMARY SCORE	X

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10. Assessing Vulnerability: Estimating Potential Losses

Requirement §201.6(c)(2)(ii)(B): [The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(ii)(A) of this section and a description of the methodology used to prepare the estimate ...

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan estimate potential dollar losses to vulnerable structures?	Pg 4-7 and 4-11 and throughout Section 4.4	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.		X
B. Does the new or updated plan describe the methodology used to prepare the estimate?	Pg 4-2	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. "The closest tax-assessed building value (derived from Montana Department of Revenue parcel data) was then used to approximate potential financial losses" (4-2).		X
SUMMARY SCORE				X

11. Assessing Vulnerability: Analyzing Development Trends

Requirement §201.6(c)(2)(ii)(C): [The plan **should** describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe land uses and development trends?	4-21 to 4-23	Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. While Petroleum County's population has been on the decline over the past 70 years, there is some new development along the Fergus County line and along the Musselshell River corridor.		X
SUMMARY SCORE				X

12. Multi-Jurisdictional Risk Assessment

Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Exec. Summary and 4-116	While Petroleum County and Winnett information is interwoven, distinctions have been made between the two jurisdictions; most noticeably seen in the differing Hazard Ratings.		X
SUMMARY SCORE				X

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MITIGATION STRATEGY: §201.6(c)(3): *The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.*

13. Local Hazard Mitigation Goals

Requirement §201.6(c)(3)(i): *[The hazard mitigation strategy shall include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A Does the new or updated plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards?	Pg 5-2.	The Plan provides a list of goals and objectives on page 5-2.		X
SUMMARY SCORE				X

14. Identification and Analysis of Mitigation Actions

Requirement §201.6(c)(3)(ii): *[The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	Pg 5-3	The Plan identifies a comprehensive range of mitigation actions; however, some of the proposed actions are not as specific as they could be, e.g. "increasing public awareness of severe weather and mitigation activities." We recommend that the mitigation action be fleshed out to describe what measures will be taken to increase public awareness.		X
B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	Pg 5-3	E.g. "Incorporate hazard mitigation into county subdivision regulation during next update" (5-3).		X
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	Pg 5-3	E.g. "Develop programs to reduce the risk to public infrastructure" (5-3).		X
SUMMARY SCORE				X

LOCAL MITIGATION PLAN REVIEW CROSSWALK

15. Identification and Analysis of Mitigation Actions: National Flood Insurance Program (NFIP) Compliance

Requirement: §201.6(c)(3)(ii): [The mitigation strategy] must also address the jurisdiction's participation in the National Flood Insurance Program (NFIP), and continued compliance with NFIP requirements, as appropriate.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the jurisdiction (s) participation in the NFIP?	Pg 4-45	Note: This requirement becomes effective for all local mitigation plans approved after October 1, 2008. "Petroleum County and the Town of Winnett are not mapped, nor are they enrolled in the National Flood Insurance Program (NFIP)" (4-45).		X
B. Does the mitigation strategy identify, analyze and prioritize actions related to continued compliance with the NFIP?	Pg 5-3	Note: This requirement becomes effective for all local mitigation plans approved after October 1, 2008. "Join the National Flood Insurance Program" (5-3).		X
SUMMARY SCORE				X

16. Implementation of Mitigation Actions

Requirement: §201.6(c)(3)(iii): [The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	Pg 5-5	An explanation of how the proposed mitigation actions were prioritized is included on page 5-5. Consideration was taken to Cost, Staff Time, Feasibility, Pop Benefit, Property Benefit, Values Benefit, Maintenance and Hazard Rating.		X
B. Does the new or updated mitigation strategy address how the actions will be implemented and administered, including the responsible department, existing and potential resources and the timeframe to complete each action?	Pg 5-8 to 5-10 Table 5.4A	Implementation, resources and timeframe information for the proposed actions is provided in Table 5.4A.		X
C. Does the new or updated prioritization process include an emphasis on the use of a cost-benefit review to maximize benefits?	Pg 5-5	There was a decided emphasis on the use of a cost-benefit review during the prioritization process.		X
D. Does the updated plan identify the completed, deleted or deferred mitigation actions as a benchmark for progress, and if activities are unchanged (i.e., deferred), does the updated plan describe why no changes occurred?	Appendix D page D-4	Appendix D outlines the 2003 mitigation actions, as well as the mitigation work that has been accomplished since then. We recommend that future updates of the Plan identify the evolution of the mitigation actions from conception to implementation. Tracking this process will help Petroleum		X

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		County and the Town of Winnett to evaluate the effectiveness of the proposed actions and make changes for the future.		
SUMMARY SCORE				X

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17. Multi-Jurisdictional Mitigation Actions

Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan include identifiable action items for each jurisdiction requesting FEMA approval of the plan?	Pg 5-3	The proposed actions are applicable to both Petroleum County and the Town of Winnett.		X
B. Does the updated plan identify the completed, deleted or deferred mitigation actions as a benchmark for progress, and if activities are unchanged (<i>i.e.</i> , deferred), does the updated plan describe why no changes occurred?		See comments above: §201.6(c)(3)(iii): D.		X
SUMMARY SCORE				X

PLAN MAINTENANCE PROCESS

18. Monitoring, Evaluating, and Updating the Plan

Requirement §201.6(c)(4)(i): [The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan describe the method and schedule for monitoring the plan, including the responsible department?	Pg 6-1 and 6-2	The Plan will be monitored by the Petroleum County LEPC. A schedule of plan updates is outlined in Table 6.3A.		X
B. Does the new or updated plan describe the method and schedule for evaluating the plan, including how, when and by whom (<i>i.e.</i> the responsible department)?	Pg 6-1			X
C. Does the new or updated plan describe the method and schedule for updating the plan within the five-year cycle?	Pg 6-1			X
SUMMARY SCORE				X

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19. Incorporation into Existing Planning Mechanisms

Requirement §201.6(c)(4)(ii): *[The plan **shall** include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan identify other local planning mechanisms available for incorporating the mitigation requirements of the mitigation plan?	Pg 5-15 to 5-17	Table 5.6B identifies plans and mechanisms available for incorporating the mitigation requirements.		X
B. Does the new or updated plan include a process by which the local government will incorporate the mitigation strategy and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?	Pg 5-15 to 5-17	Table 5.6B includes a thorough process for integration of mitigation strategies into the identified planning mechanisms.		X
C. Does the updated plan explain how the local government incorporated the mitigation strategy and other information contained in the plan (e.g., risk assessment) into other planning mechanisms, when appropriate?		Appendix J does provide information on project completed and a brief write up on plan integration. Integrating mitigation and the concepts there of are a critical to insure mitigation planning and the concepts of mitigation are completed. Recommended Revisions: When providing information regarding incorporation into other existing plans using the FEMA approved table format, expand on the descriptions of "Method of Incorporation into Hazard Mitigation Plan". A statement such as "Plan Revision" is not detailed enough to convey a method for incorporation. In addition, it is recommended to identify the responsible party and the schedule for method of incorporation.		X
SUMMARY SCORE				X

Continued Public Involvement

Requirement §201.6(c)(4)(iii): *[The plan maintenance process **shall** include a] discussion on how the community will continue public participation in the plan maintenance process.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the new or updated plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan	Pg 6-2	The Plan continues to exhibit a strong commitment to public participation. "The public is invited to attend all LEPC meetings and the annual 'Mitigation Year		X

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committee, or annual review meetings with stakeholders?)		Review' meeting to provide input and feedback" (6-2).		
SUMMARY SCORE				X